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SEALED BY ORDER  
OF COURT

FILED

JAN 10 2020

SUSAN Y. SOONG  
CLERK, U.S. DISTRICT COURT  
NORTH DISTRICT OF CALIFORNIA  
SAN JOSE OFFICE

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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

ELIZABETH HOLMES and  
RAMESH "SUNNY" BALWANI,

Defendants.

Case No. CR-18-00258-EJD-SVK

DEFENDANT ELIZABETH A. HOLMES'  
NOTICE PURSUANT TO FEDERAL RULE OF  
CRIMINAL PROCEDURE 12.2(b)

FILED UNDER SEAL

Hon. Edward J. Davila

Pursuant to Federal Rule of Criminal Procedure 12.2(b)(1), defendant Elizabeth Holmes hereby gives notice that she may introduce expert evidence at trial related to a mental condition bearing on guilt.

If offered, the expert is expected to testify regarding: scientific research addressing intimate partner abuse, including vulnerability to intimate partner abuse, the dynamics of intimate partner abuse, and the psychological effects of an abusive relationship on its victims, both during and in the wake of an abusive relationship; whether and how Ms. Holmes' relationship with Mr. Balwani was consistent with intimate partner abuse; whether and how Ms. Holmes' psychological responses during and after the

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1 relationship were and are consistent with the typical reactions of victims of an abusive relationship; and  
2 Ms. Holmes' particular vulnerability to an abusive relationship, [REDACTED] The  
3 expert may further testify regarding a forensic evaluation of Ms. Holmes. The expert may also testify  
4 regarding present diagnoses of Post-Traumatic Stress Disorder, depression, and anxiety.  
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6 DATED: December 16, 2019

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